

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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U.S. Securities and Exchange Commission,

Civil No. 11-723 (ADM/JSM)

Plaintiff,

v.

Marlon Quan, Acorn Capital Group,  
LLC, Stewardship Investment  
Advisors, LLC, Stewardship Credit  
Arbitrage Fund, LLC, Putnam Green,  
LLC, Livingston Acres, LLC, and  
ACG II, LLC,

Defendants,

Florene Quan,

Relief Defendant,

Nigel Chatterjee,

Intervenor,

DZ Bank AG Deutsche  
Zentral-Genossenschaftsbank,  
Frankfurt am Main,

Intervenor,

Sovereign Bank,

Intervenor,

Topwater Exclusive Fund III, LLC,  
Freestone Low Volatility Partners, LP and  
Freestone Low Volatility Qualified Partners, LP

Intervenors,

and

Gary Hansen,

Receiver.

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**MOTION OF DEFENDANTS STEWARDSHIP CREDIT ARBITRAGE FUND, LLC, PUTNAM GREEN, LLC, AND LIVINGSTON ACRES, LLC FOR APPROVAL OF STIPULATION REGARDING STEWARDSHIP CREDIT ARBITRAGE FUND, LLC, PUTNAM GREEN, LLC, AND LIVINGSTON ACRES, LLC**

Defendants Stewardship Credit Arbitrage Fund, LLC, Putnam Green, LLC, and Livingston Acres, LLC (the “Receivership Defendants”) hereby move the Court for an order approving the Stipulation Regarding Stewardship Credit Arbitrage Fund, LLC, Putnam Green, LLC, and Livingston Acres, LLC (“Stipulation.”) The Stipulation has been executed on behalf of the Securities and Exchange Commission, the Quan defendants (Marlon Quan, Florene Quan, Acorn Capital Group, LLC, Stewardship Investment Advisors, LLC, and ACG II, LLC) and the Receivership Defendants. This motion is based on the Stipulation on the Receivership Defendants’ Memorandum of Law, and on all filings and proceedings in this matter.

Date: June 6, 2013

**OPPENHEIMER WOLFF & DONNELLY LLP**

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Gary Hansen (#40617)

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**RECEIVER FOR STEWARDSHIP CREDIT  
ARBITRAGE FUND, LLC, PUTNAM GREEN,  
LLC, AND LIVINGSTON ACRES, LLC**